

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**CURLING PLAINTIFFS’ FIRST REQUESTS FOR PRODUCTION  
OF DOCUMENTS TO STATE DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Rule[s]”), Plaintiffs Donna Curling, Donna Price and Jeffrey Schoenberg (collectively, the “Curling Plaintiffs”) hereby request that Defendants Brad Raffensperger, David J. Worley, Rebecca N. Sullivan, Ralph F. “Rusty” Simpson, Seth Harp, and the Georgia State Election Board (collectively, the “State Defendants”) produce the documents, electronically stored information, and tangible things specified herein below in this First Set of Requests for Production (the “Requests”) at the offices of Krevolin & Horst, 1201 West Peachtree Street, Suite 3250, Atlanta, Georgia 30309. Further, the State Defendants are required to timely serve a written response to the Requests that conforms, in all respects, to

9. The Requests are deemed to be continuing so as to require the timely submission of supplemental responses and the production of additional documents or other information pursuant to the Rules and other applicable authority. Plaintiffs specifically reserve the right to seek supplemental responses and additional supplemental production of documents before trial.

### **REQUESTS FOR PRODUCTION**

#### **Request for Production No. 1:**

All documents related to any actual, potential, anticipated, suspected, contemplated, or alleged Security Breach or Security Vulnerability, including but not limited to (i) all documents relating to any investigation, report, examination, study, audit, evaluation, or assessment conducted by You or a third party on Your behalf or at your direction regarding any such Security Breach or Security Vulnerability; and (ii) all communications related to any such Security Breach or Security Vulnerability.

#### **Request for Production No. 2:**

Documents sufficient to show your policies and procedures—whether formal or informal, written or unwritten, implemented or not—for preventing, assessing, identifying, evaluating, monitoring for, investigating, mitigating, remedying, or otherwise limiting, addressing, or responding to any actual,

vendor, or anyone else acting on behalf or at the direction of either entity for any or all purposes related to the Election System.

**Request for Production No. 8:**

All documents constituting, reflecting, or related to any communication with, inquiry from, or investigation by the Department of Homeland Security (DHS), the United States Election Assistance Commission, the FBI, the GBI, or other government branch, agency, department, or committee related to the security, reliability, or accessibility of any aspect of the Election System.

**Request for Production No. 9:**

All documents related to Your decision to forgo, decline, refuse, or otherwise not accept federal assistance, including but not limited to funds, for purposes related to the security or reliability of any aspect of the Election System.

**Request for Production No. 10:**

Documents sufficient to show Your policies and procedures related to maintaining, upgrading, updating, replacing, repurposing, decommissioning, erasing, overwriting, discontinuing, and/or destroying each of the following equipment, including but not limited to any software updates, patches, or fixes, and any hardware or firmware maintenance or updates: DREs; Optical Scanners; memory cards used or otherwise compatible with any; DRE GEMS servers;

**Request for Production No. 38:**

Documents sufficient to identify each election, including the anticipated date and historical voter turnout for each such election, occurring in Georgia through the end of 2020.

Dated: June 3, 2019

Respectfully,

/s/ David D. Cross

David D. Cross (*pro hac vice*)  
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# **SLIPSHEET**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**PLAINTIFFS' JOINT REQUEST FOR PRODUCTION  
OF DOCUMENTS AND INSPECTION OF THINGS  
TO STATE DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Rule[s]”), Plaintiffs request that Defendants Secretary of State Brad Raffensperger, the State Election Board, and the State Election Board Members (collectively, the “State Defendants”) produce and make available for inspection the documents, electronically stored information, and tangible things specified herein below in this Set of Requests for Production (the “Requests”).

to using hand-marked paper ballots in the June 9, 2020 primary elections, including but not limited to State Election Board Rules 183-1-12-.11(2)(c)-(d).

**Request for Production No. 2:**

Documents from the Relevant Time Period reflecting all actual, potential, anticipated, suspected, contemplated, or alleged Security Breaches or Security Vulnerabilities including, but not limited, to documents reflecting (i) all investigations, reports, examinations, studies, findings, audits, evaluations, and/or assessments conducted by You or a third party on Your behalf or at Your direction regarding any such Security Breach or Security Vulnerability; and (ii) all actions and/or steps considered, contemplated, discussed, approved, implemented, and/or rejected as potential remediation for any such Security Breach or Security Vulnerability.

**Request for Production No. 3:**

Documents showing (i) all steps taken to comply with the Court's following directive in its August 2019 Order granting a preliminary injunction (*Curling*, 397 F. Supp. 3d at 1411): "The Secretary of State's Office should work with its consulting cybersecurity firm to conduct an in-depth review and formal assessment of the issues relating to exposure and accuracy of the voter registration database discussed here as well as those related issues that will migrate over to the State's

selected by Plaintiffs, of DREs, ballot-marking devices, ballot scanners (both AccuVote and Dominion), election servers (both GEMS and Dominion), and memory cards and/or smart cards used with Dominion election equipment; and (ii) the memory cards from Cobb, DeKalb, and Fulton Counties already provided to Plaintiffs for any Security Breaches or Security Vulnerabilities.

Respectfully submitted this 3rd day of August, 2020.

/s/ David D. Cross

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